

**EXAMPLE COMPLIANCE ASSURANCE MONITORING PLAN:  
FABRIC FILTER FOR PM CONTROL – 1**

**I. Background**

**A. Emissions Unit**

Description:	Line 3 Particleboard Sander
Identification:	M2
Facility:	Facility J
	Anytown, USA

**B. Applicable Regulation, Emission Limit, and Pre-CAM Monitoring Requirements**

Regulation:	OAR 340-21, permit
CAM Emission limits:	Particulate matter: 0.1 gr/dscf, 3 hr avg.
Pre-CAM monitoring requirements:	Visible emissions, periodic monitoring (Method 22)

**C. Control Technology, Capture System, Bypass, PTE**

Controls:	Pulse-jet baghouse operated under negative pressure.
Capture System:	Closed-duct system
Bypass:	None
PTE before controls:	150 TPY (Based on 99% control efficiency of the baghouse)
PTE after controls:	1.5 TPY

**II. Monitoring Approach**

**A. Indicators**

Visible emissions will be used as an indicator. Normal process operations will not produce conditions that adversely affect the baghouse, so no process operational parameters will be monitored.

**B. Measurement Approach**

Visible emissions from the baghouse exhaust will be monitored daily using EPA Reference Method 22-like procedures. A 6-minute observation will be performed and recorded in a log book by the observer.

**C. Indicator Range**

An excursion is defined as the presence of visible emissions.

**D. Performance Criteria**

Data Representativeness:	Measurements are being made at the emission point (baghouse exhaust).
QA/QC Practices and Criteria:	The observer will be familiar with Reference Method 22 and follow Method 22-like procedures.

**III. Response to Excursion**

- A. Upon noting visible emissions, the observer will immediately notify maintenance to inspect the baghouse, and operations to slow down production as feasible. Maintenance personnel will inspect the baghouse within 4 hours of receiving notification and make needed repairs as soon as practicable. Operation will return to normal upon completed corrective action.
- B. QIP Threshold: Five excursions in a 6-month reporting period. (Note: Proposing a QIP threshold in the CAM submittal is not required.)

## JUSTIFICATION

### I. Background

The pollutant-specific emission unit is the Line No. 3 Sander, which is used to sand particleboard to the customer's desired thickness. It is controlled by a Western Pneumatic pulse-jet baghouse with 542 bags, which filters approximately 50,000 ft<sup>3</sup> of air from the sander. The sander has a closed-vent system to the baghouse. There is no means for the baghouse to be bypassed.

### II. Rationale for Selection of Performance Indicators

Visible emissions was selected as the performance indicator because it is indicative of good operation and maintenance of the baghouse. When the baghouse is operating properly, there will not be any visible emissions from the exhaust. Any increase in visible emissions indicates reduced performance of a particulate control device, therefore, the presence of visible emissions is used as a performance indicator.

### III. Rationale for Selection of Indicator Ranges

The selected indicator range is no visible emissions. When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required to correct the situation. All excursions will be documented and reported. An indicator range of no visible emissions was selected because: (1) an increase in visible emissions is indicative of an increase in particulate emissions; and (2) a monitoring technique which does not require a Method 9 certified observer is desired. Although RM 22 applies to fugitive sources, the visible/no visible emissions observation technique of RM-22 can be applied to ducted emissions; i.e., Method 22-like observations.

The selected QIP threshold for baghouse visible emissions is five excursions in a 6-month reporting period. This level is 3 percent of the total visible emissions observations. If the QIP threshold is exceeded in a semiannual reporting period, a QIP will be developed and implemented. (Note: Proposing a QIP threshold in the CAM submittal is not required.)